## REMARKS/ARGUMENTS

The rejections presented in the Office Action dated January 24, 2007 (hereinafter Office Action) have been considered. Claims 7, 8, 15, and 20-35 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

The Examiner has objected to Claims 7, 8 and 15 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. The Applicants thank the Examiner for favorable consideration of these claims. Applicants have rewritten Claims 7 and 15 in independent form to include all of the limitations of the base claim and any intervening claims. Allowance of Claims 7, 8, and 15 is therefore respectfully requested.

Claims 1-2, 9-10 and 16-19 are rejected based on 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2003/0078034 by Tsutsumi et al. (hereinafter "*Tsutsumi*"). Claim 3 is rejected based on 35 U.S.C. §103(a) as being unpatentable over *Tsutsumi* in view of U.S. Publication No. 2004/0083114 by Yue (hereinafter "*Yue*"). Claims 4-5 and 12-13 are rejected based on 35 U.S.C. §103(a) as being unpatentable over *Tsutsumi* in view of U.S. Patent No. 6,292,833 to Liao et al. (hereinafter "*Liao*"). Claims 6, 11 and 14 are rejected based on 35 U.S.C. §103(a) as being unpatentable over *Tsutsumi* in view of U.S. Publication No. 2002/0123335 by Luna et al. (hereinafter "*Luna*").

Applicants respectfully traverse these rejections, and submit that the rejected claims are neither anticipated nor rendered obvious in view of the cited references. However, in order to facilitate prosecution, Applicants have canceled Claims 1-6, 9-14, and 16-19 and added new Claims 20-35. Thus, without acquiescence of the rejections or reasons therefor, the Applicants reserve the right to file continuing applications involving the original subject

matter of the application, including that subject matter associated with original Claims 1-6, 9-14, and 16-19.

Newly added Claims 20-35 at least indicate that a proxy sends a message to a mobile terminal using an asynchronous data push service and a TCP connection is established based on the message. For example, Claim 1 sets forth that a content request is received at a proxy server via an IP network. The content request is targeted to a mobile terminal lacking a fixed address for receiving requests from the IP network. In response to the content request, a message is sent to the mobile terminal using an asynchronous data push service. The message includes data indicating that that the mobile terminal is being requested to operate as a mobile server in response to the content request. A TCP connection is established between the proxy server and mobile terminal in response to the content request, the proxy server supplying content on behalf of the mobile terminal using the TCP connection.

Applicants submit that these claims are fully supported in the Specification as originally filed. For example, an asynchronous data push service is described on page 15, lines 15-28 of the Specification. The mobile operator network is described, for example, in description of FIG. 1 in pages 8-9, and on page 14, lines 9-15. The TCP connection between the terminal and proxy is described, for example, in originally filed Claim 5.

Applicants respectfully submit that newly added Claims 20-35 are patentable over the various combinations of *Tsutsumi*, *Yue*, *Liao*, and *Luna*. None of these references describe a proxy sending a message a mobile terminal using an asynchronous data push service and a TCP connection being established based on the message.

For example, *Tsutsumi* describes a computer that requests data from a cell phone 12 using a host name of a gateway device 50 and the telephone number of the target cell phone 12 (*Tsutsumi*, 0092). In response, an "address determining device" 34 uses the phone number to identify a communications device 32 that can reach the terminal 12 (*Tsutsumi*, 0093). Thereafter, "setting of a wireless link and the like is performed by the

communications device 32 of the network device 16 with respect to the cellular telephone 12 (S24), and when this connecting procedure is completed, the connection of the personal computer 46 to the cellular telephone 12 is completed." (*Tsutsumi*, 0095). However, *Tsutsumi* is silent as to any details on how the communications device 32 and phone 12 establish these connections and exchange data. Therefore *Tsutsumi* does not teach or suggest sending a message a mobile terminal using an asynchronous data push service and a TCP connection being established based on the message.

*Yue* is similarly deficient in teaching or suggesting use of an asynchronous data push service to establish a TCP connection. *Yue* describes a mobile terminal that may include an embedded Web server (*Yue*, 0030 and 0035-0036). In order to access mobile server, "a browser must use the address lookup service to resolve the network address of the page server for the given number," where the address lookup service is "a directory service whose main function is to find the network address of the corresponding phone web page server for a given phone number." (*Yue*, 0043). However, *Yue* only describes accesses to mobile servers that are directly connected to the Internet (*Yue*, 0046), and *Yue* does not describe any situation where the server is not connected to an IP network at all. As a result, *Yue* fails to suggest that an asynchronous data push service may be used to access a mobile server.

As to the *Liao* and *Luna* references, Applicants submit that these references also fail to cure the deficiencies of *Tsutsumi*. Further, these references are directed to remote provisioning of terminals, and not to serving content from mobile terminals, and for this additional reason are not highly pertinent to Applicants' claims. Therefore, because none of *Tsutsumi*, *Yue, Liao*, or *Luna* alone teach or suggest at least sending a message to a mobile terminal using an asynchronous data push service, nor do they teach or suggest establishing a TCP connection based on the message, any combination of these references also fails to teach or suggest these features. Accordingly, Applicants respectfully submit that Claims 20-35 are in condition for allowance.

Authorization is given to charge Deposit Account No. 50-3581 (NOKM.052PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

HOLLINGSWORTH & FUNK, LLC
8009 34th Avenue South, Suite 125
Minneapolis, MN 55425
952.854.2700

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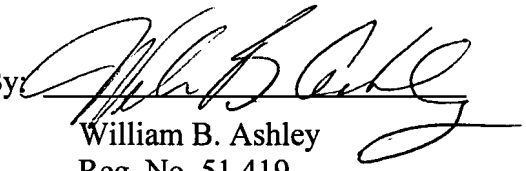
By: 

William B. Ashley
Reg. No. 51,419